

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
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APR 30 2010
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CLERK, U.S. DISTRICT COURT
By U.S. DISTRICT COURT
By Deputy

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DETOREI J. CRAIN)
Plaintiff,)
vs.)
LANGBERT FINANCIAL, INC., et al)
Defendants)

)

CASE NO. 3-09CV2358-D

ORIGINAL ANSWER OF
LANGBERT FINANCIAL,
INC.

COMES NOW Defendant, LANGBERT FINANCIAL, INC.

("Langbert"), and files this its Original Answer to the Original Complaint (hereinafter the "Complaint") filed by DeTorei J. Crain ("Plaintiff") in the above-numbered and styled litigation.

ANSWER

1. Langbert denies the allegations contained in paragraph 1 of the Complaint.
2. Langbert admits the allegations contained in paragraph 2 of the Complaint.
3. Langbert admits the allegations contained in paragraph 3 of the Complaint.
4. Langbert admits the allegations contained in paragraph 4 of the Complaint.

5. Langbert admits the allegations contained in paragraph 5 of the Complaint.
6. Langbert admits the allegations contained in paragraph 6 of the Complaint.
7. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 7 of the Complaint.
8. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 8 of the Complaint.
9. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 9 of the Complaint.
10. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 10 of the Complaint.
11. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 11 of the Complaint.
12. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 12 of the Complaint.
13. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 13 of the Complaint.
14. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 14 of the Complaint.

15. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 15 of the Complaint.
16. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 16 of the Complaint.
17. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 17 of the Complaint.
18. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 18 of the Complaint.
19. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 19 of the Complaint.
20. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 20 of the Complaint.
21. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 21 of the Complaint.
22. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 22 of the Complaint.
23. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 23 of the Complaint.
24. Langbert admits the allegations contained in paragraph 24 of the Complaint.

25. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 25 of the Complaint.
26. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 26 of the Complaint.
27. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 27 of the Complaint.
28. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 28 of the Complaint.
29. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 29 of the Complaint.
30. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 30 of the Complaint.
31. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 31 of the Complaint.
32. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 32 of the Complaint.
33. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 33 of the Complaint.
34. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 34 of the Complaint.

35. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 35 of the Complaint.
36. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 36 of the Complaint.
37. Langbert incorporates is responses above in response to paragraph 37 on Plaintiff's complaint.
38. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 38 of the Complaint.
39. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 39 of the Complaint.
40. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 40 of the Complaint.
41. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 41 of the Complaint.
42. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 42 of the Complaint.
43. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 43 of the Complaint.
44. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 44 of the Complaint.

45. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 45 of the Complaint.
46. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 46 of the Complaint.
47. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 47 of the Complaint.
48. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 48 of the Complaint.
49. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 49 of the Complaint.
50. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 50 of the Complaint.
51. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 51 of the Complaint.
52. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 52 of the Complaint.
53. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 53 of the Complaint.
54. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 54 of the Complaint.

55. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 55 of the Complaint.
56. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 56 of the Complaint.
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58. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 58 of the Complaint.
59. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 59 of the Complaint.
60. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 60 of the Complaint.
61. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 61 of the Complaint.
62. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 62 of the Complaint.
63. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 63 of the Complaint.
64. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 64 of the Complaint.

65. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 65 of the Complaint.
66. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 66 of the Complaint.
67. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 67 of the Complaint.
68. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 68 of the Complaint.
69. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 13 of the Complaint.
70. Langbert denies the allegations contained in paragraph 70 of the Complaint.
71. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 71 of the Complaint.
72. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 72 of the Complaint.
73. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 73 of the Complaint.
74. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 74 of the Complaint.

75. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 75 of the Complaint.
76. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 76 of the Complaint.
77. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 77 of the Complaint.
78. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 78 of the Complaint.
79. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 79 of the Complaint.
80. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 80 of the Complaint.
81. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 81 of the Complaint.
82. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 82 of the Complaint.
83. Langbert lacks knowledge or information sufficient to form about the truth of the allegations alleged in paragraph 83 of the Complaint.

JURY DEMAND

84. Langbert hereby demands a jury trial on all issues so triable.

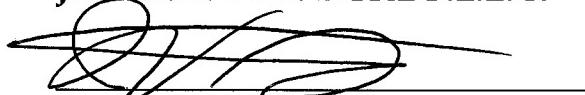
PRAYER FOR RELIEF

85. Langbert prays that Plaintiff take nothing by its suit against it and that Langbert recover reasonable attorney fees, court costs, and be granted all such further relief, in law and in equity, to which it may show itself to be justly entitled.

DATE: April 20, 2010

Respectfully submitted,

**THE LAW OFFICE OF
JASON L. VAN DYKE P.L.L.C.**



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Attorney for Langbert Financial, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was mailed to DeTorei J. Crain, Plaintiff, at 2404 FM 423, Suite 300-525, Little Elm, TX 75068 by U.S. Certified Mail No. 7009 2820 0003 2752 9291 postage pre-paid, return receipt requested, on April 28, 2010.



JASON L. VAN DYKE

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April 28, 2010

Clerk of the Court
U.S. District Court - N.D.Tex
1100 Commerce Street, #1452
Dallas, TX 75242

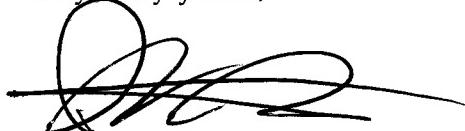
Re: Original Answer
3-09CD2358-D

Dear Sir or Madame Clerk:

Please file the enclosed Original Answer, file stamp the enclosed photocopy, and return a file-stamped copy of the answer to my attention in the enclosed postage-paid envelope.

I appreciate your courtesy. If you have any questions or concerns, please do not hesitate to contact me.

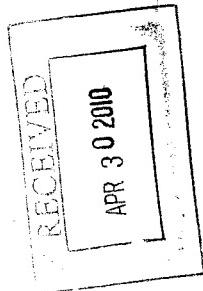
Very truly yours,



Jason L. Van Dyke
Attorney & Counselor at Law



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